



Alabama Department of Environmental Management  
adem.alabama.gov

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November 18, 2016

Ms. Beverly H. Banister  
Director  
Air, Pesticides, and Toxics Management Division  
US EPA Region IV  
61 Forsyth Street  
Atlanta, GA 30303-8960

Dear Ms. Banister:

The Department is in receipt of your comment regarding the 2016 Alabama Ambient Air Monitoring Network Plan, dated November 4, 2016.

The sole deficiency cited involved lead monitoring requirements for the area surrounding the Anniston Army Depot. Please find below information that should assuage EPA's concern.

40 CFR Part 58, Appendix D, Section 4.5 requires that a source-oriented monitoring site be located at a source which emits .50 or more tons of lead per year. Since 2012, this source's lead emissions have been below .50 tpy (please see table below). This data was submitted to the NEI and is reflected in the 2014 version of the inventory. I am enclosing an excerpt from the 2014 NEI reflecting these emissions levels.

Year	Lead Emissions (tpy)
2012	0.29
2013	0.33
2014	0.33
2015	0.33

EPA previously pointed out this perceived deficiency in its comments pertaining to the 2015 Alabama Ambient Air Monitoring Network Plan. In response to that comment, the Department explained to EPA in a letter dated December 16, 2015 (attached), that the emissions from this facility were below the .50 tpy threshold and that neither a monitor nor a waiver should be required. We offered to provide any further information to lay this issue to rest.

In view of the above information, EPA should revise its letter of November 4, 2016, by stating that there are no deficiencies in ADEM's 2016 network plan. Please let me know if a revised letter is not forthcoming.



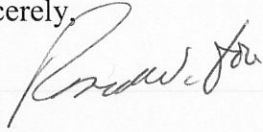
Ms. Beverly H. Banister

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If you have any questions or require further information, please call Larry Brown at 334-271-7878 or email at [lwb@adem.alabama.gov](mailto:lwb@adem.alabama.gov).

Sincerely,

A handwritten signature in dark ink, appearing to read "Ronald W. Gore", written over the word "Sincerely,".

Ronald W. Gore, Chief  
Air Division  
Alabama Department of Environmental Management

RWG/DH/bdc

Enclosure